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Attorneys for Defendant
TEXAS EASTERN OVERSEAS, INC.

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

AMERIPRIDE SERVICES INC., a
Delaware corporation,

Plaintiff,

vs.

VALLEY INDUSTRIAL SERVICES, INC.,
a former California Corporation, et al.

Defendants.

**AND CONSOLIDATED ACTION AND
CROSS AND COUNTER-CLAIMS.**

FILED

OCT 19 2016

CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
BY  DEPUTY CLERK

Case No. 2:00-cv-00113-MCE-DB

**STIPULATION AND ORDER RE TRIAL
EXHIBITS TO WHICH NO OBJECTION
WAS RAISED**

Trial Date: October 17-19, 2016
Time: 9:00 a.m.
Courtroom: 7
Judge: Hon. Morrison C. England, Jr.

Complaint Filed: January 20, 2000

1 Plaintiff AMERIPRIDE SERVICES INC. ("AmeriPride") and Defendant TEXAS
2 EASTERN OVERSEAS, INC. ("TEO"), by and through their respective counsel, stipulate
3 as follows with respect to the admissibility of public agency documents or records:

4 **RECITALS**

5 1. AmeriPride and TEO each designated certain documents and records as
6 evidence to be introduced at trial, see ECF No. 1063-1 at 5-28 and 29-108;

7 2. On October 11, 2016, AmeriPride and TEO each filed and served objections
8 to some but not all of the other party's trial exhibits, see ECF Nos. 1087 and 1089;

9 3. To facilitate a more efficient trial, AmeriPride and TEO have agreed to
10 stipulate to the admissibility of all exhibits to which objections were not raised by the
11 parties on October 11, 2016;

12 4. On the first day of trial, the Court agreed to allow the parties to jointly move
13 into evidence all of the exhibits to which objections were not raised.

14 **STIPULATION**

15 Based on the foregoing, AmeriPride and TEO, through their respective counsel of
16 record, stipulate as follows:

17 1. All documents and records on each party's respective exhibit list to which the
18 other party did not object on October 11, 2016 are admissible evidence;

19 2. Each of the exhibits subject to this Stipulation on AmeriPride's Exhibit List
20 are listed on the attached **Exhibit A**;

21 3. Each of the exhibits subject to this Stipulation on TEO's Exhibit List are listed
22 on the attached **Exhibit B**;

23 4. AmeriPride and TEO jointly request that the Court receive into evidence all of
24 the exhibits listed on **Exhibit A** and **Exhibit B**.

25 Date: October 18, 2016

BASSI, EDLIN, HUIE & BLUM LLP

26
27 By: /s/ Erin Poppler
FRED M. BLUM
ERIN K. POPPLER

Attorneys for Defendant
TEXAS EASTERN OVERSEAS, INC.

Date: October 18, 2016

HUNSUCKER GOODSTEIN PC

By: /s/ Marc Shapp
PHILIP C. HUNSUCKER
BRIAN L. ZAGON
MARC A. SHAPP
Attorneys for Plaintiffs
AMERIPRIDE SERVICES INC.

Date: October 18, 2016

PERKINS MANN & EVERETT, APC

By: /s/ Lee Smith
LEE N. SMITH
Attorneys for Plaintiffs
AMERIPRIDE SERVICES INC.

ORDER

IT IS SO ORDERED.

Date: 10.19.16



HON. MORRISON C. ENGLAND, JR.
JUDGE, UNITED STATES DISTRICT COURT